

**REMARKS/ARGUMENTS**

Claims 7-19 are pending. Claims 13-19 have been appended.

Claim 7 and 9-11 were rejected under 35 U.S.C. 103(a) for allegedly being unpatentable over Chong, Jr., U.S. Patent No. 5,928,367 ("Chong") and Nelson et al., U.S. Patent No. 5,928,367 ("Nelson").

Claim 8 was rejected under 35 U.S.C. 103(a) for allegedly being unpatentable over Chong and Nelson in view of Richardson, U.S. Patent No. 6,219,753.

Claim 12 is rejected under 35 U.S.C. 103(a) as being unpatentable over Chong and Nelson in view of Idleman et al., U.S. Patent No. 5,274,645.

**The present invention**

An aspect of the present invention, as recited in independent claim 7, as previously presented, is "second controller configured to detect receipt of said error indication and in response to receiving said error indication to configure [a] second standby port for data exchange between said first host and said disk devices based on configuration information about said first current port that is stored in said second controller." (underlining added to highlight). The second controller contains port configuration information about a current port in the first controller. This aspect of the invention is more positively recited in claim 7 as currently amended herein.

As currently amended, claim 7 recites a second controller "having stored therein port configuration information representative of said first current port" wherein the second controller "configure[s] said second standby port for data exchange between said first host and said disk devices based on said port configuration information" when an error condition in the first controller is detected.

**The prior art rejections**

The cited references do not show a second controller "having stored therein port configuration information representative of said first current port" or that the second controller "configure[s] said second standby port for data exchange between said first host and said disk

devices based on said port configuration information” when an error condition in the first controller is detected.

For example, Chong shows in Fig. 5A, a system configuration of host computers A and B, loops A and B, and controllers A and B (520, 530). Figs. 5BA and 5BB show a detailed connection of the two controllers. The controller (520) is connected to host computer A by way of loop A via a loop interface (521b), and is also connected to host computer B by way of loop B via a loop interface (521a). Similarly, the controller (530) is connected to host computer A by way of loop A via a loop interface (531b), and is also connected to host computer B by way of loop B via a loop interface (531a).

Suppose, for the sake of argument, that controller (520) corresponds to the recited first controller and controller (530) corresponds to the recited second controller, and that host computer A corresponds to the recited first computer and host computer B corresponds to the recited second computer. It follows that the loop interface (521b) corresponds to the recited first current port and that the a loop interface (521a) corresponds to the first standby port, and further that the a loop interface (531a) corresponds to the recited second current port and that the loop interface (531b) corresponds to the recited second standby port.

If the first controller (520) fails, then the second controller (530) can transfer data to memory A (540) via path (584). *Col. 5, lines 26-29*. The second controller (530) of Chong does not perform a configuration of the second standby port (531b) with information about the first current port (521b) upon failure of the first controller, such as recited the pending claims. The reason that Chong does not perform such a configuration action is that the controller (530) in Chong taps (536b) data on the loop A and stores that data to its cache (535). Since data from loop A is already being tapped even before a failure occurs in the first controller, there clearly is no need to configure the second standby port (531b).

Chong therefore does not show a second controller “having stored therein port configuration information representative of said first current port” or that the second controller “configure[s] said second standby port for data exchange between said first host and said disk devices based on said port configuration information” when an error condition in the first controller is detected. Moreover, since Chong performs tapping of the loop A, even before a

failure occurs, there clearly is no need to perform a configuration operation. Thus, despite any teachings in other prior references, the Chong device does not motivate one of ordinary skill to perform a configuration operation.

CONCLUSION

In view of the foregoing, all claims now pending in this Application are believed to be in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,



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